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ENTITY NAME	PART OF PLAN AND/OR EVALUATION	PHONE NUMBER	EMAIL ADDRESS
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INSPECTOR REPRESENTATIVE(S)	PHMSA/STATE	REGION/STATE	EMAIL ADDRESS	LEAD
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Mileage Covered by Public Awareness Program (by Company and State)

Based on the most recently submitted annual report, list each company and subsidiary separately, broken down by state (using 2-letter designation). Also list any new lines in operation that are not included on the most recent annual report. If a company has intrastate and/or interstate mileage in several states, use one row per state. If there both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

COMPANY NAME	OPERATOR ID	PRODUCT TYPE	STATE	GATHERING	TRANSMISSION	DISTRIBUTION*	REMARKS (new?)
				INTRASTATE	INTRASTATE	INTRASTATE	
PRAIRIELAND PIPELINE, LLC	38908	Natural Gas	IL	0	5	0	

1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
3. Use only 2-letter state codes in column #3, e.g., TX for Texas.
4. Enter number of applicable miles in all other columns. (Only positive values. No need to enter 0 or n/a.)
5. *Please do not include Service Line footage. This should only be MAINS.

Please provide a comment or explanation for inspection results for each question.

1. Administration and Development of Public Awareness Program

1.01 Written Public Education Program

Does the operator have a written continuing public education program or public awareness program (PAP) in accordance with the general program recommendations in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference), by the required date, except for master meter or petroleum gas system operators?

- ☒ Verify the operator has a written public awareness program (PAP).
- ☒ Review any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if any, addressed in the operator's PAP.
- ☒ Identify the location where the operator's PAP is administered and which company personnel is designated to administer and manage the written program.
- ☒ Verify the date the public awareness program was initially developed and published.

CODE REFERENCE: § 192.616 (h); § 195.440 (h)

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

The current Public Awareness ("PA") Plan is located in Section 10 of Prairielands Operation and Maintenance ("O&M") Plan.

There was no clearinghouse deficiencies to address.

The plan is administered by USDI for Prairieland Pipeline out of the Olney, Illinois Office.

The initial plan was established and published by the effective date and was revised in 2012 after an ICC audit.

1.02 Management Support

Does the operator's program include a statement of management support (i.e., is there evidence of a commitment of participation, resources, and allocation of funding)?

- ☒ Verify the PAP includes a written statement of management support.
- ☒ Determine how management participates in the PAP.
- ☒ Verify that an individual is named and identified to administer the program with roles and responsibilities.
- ☒ Verify resources provided to implement public awareness are in the PAP. Determine how many employees involved with the PAP and what their roles are.
- ☒ Determine if the operator uses external support resources for any implementation or evaluation efforts.

CODE REFERENCE: § 192.616 (a); § 195.440 (a), API RP 1162 Section 2.5 and 7.1

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

The current Management of Support statement is located on page 4 of the plan and is signed by the President of Prairieland Pipeline.

Management provides the necessary time resources and funding for the program.

Darin Houchin and Mike Wendling of USDI, are named as administrators of the PA program which defines their duties as administrators in C of Section 10 on page 5.

There are two people assigned as joint administrators over the PA program.

USDI utilizes Paradigm as external support for developing and printing the mailing materials, establishing the location of the various audiences and conducting the mailings of the required materials. Once the feedback is received from the affected audiences Paradigm provides a report to USDI indicating who responded to the survey and how they responded to the associated questionnaires returned to Paradigm either by mail or via Paradigm's web site. USDI also tracks the number of calls received directly by the operator regarding the PA plan and associated materials. USDI is required to conduct the Public Official's liaison and documents this information separate from Paradigm.

1.03 Unique Attributes and Characteristics

Does the operator's program clearly define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities?

- Verify the PAP includes all of the operator's system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc).
- Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor stations, valves, breakout tanks, odorizers).

CODE REFERENCE: § 192.616 (b); § 195.440 (b), API RP 1162 Section 2.7 and Section 4

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

Unique attributes are defined in B of Section 10 on pages 4-5 of the PA plan. This section also references Section 3 System Description which defines the system design parameters and major system components.

1.04 Stakeholder Audience Identification

Does the operator's program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?

- Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline.
- Determine the process and/or data source used to identify each stakeholder audience.
- Select a location along the operator's system and verify the operator has a documented list of stakeholders consistent with the requirements and references noted above.

[] Affected public

[] Emergency officials

[] Public officials

[] Excavators

CODE REFERENCE: § 192.616 (d), (e), (f); § 195.440 (d), (e), (f), API RP 1162 Section 2.2 and Section 3

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

Paradigm utilizes a GIS program to identify the addresses of the stakeholders within a pre-described geographical area. Currently, Prairieland is using a 200 yard buffer to identify the location/address of stakeholders. Paradigm utilizes Standard Industrial Classification Codes ("SIC") to classify the type of business stakeholder. Geocoding is utilized to establish the address of the stakeholder. They also utilize where available parcel boundaries and common land units to identify the address of the stakeholders. Emergency Officials are identified using Public Safety Access Points ("PSAP").

Staff's review of the system mapping and list of stakeholders indicates that the affected public has been identified along the pipeline route. The process used by Paradigm is defined in D and E of Section 10.

1.05 Message Frequency and Message Delivery

Does the operator's program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

- Identify where in the operator's PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders: (1) affected public (2) emergency officials (3) local public officials, and (4) excavators.

☐ Affected public

☐ Emergency officials

☐ Public officials

☐ Excavators

CODE REFERENCE: § 192.616 (f); § 195.440 (f), API RP 1162 Sections 3-5

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

Message frequency and delivery is defined in F of Section 10 on pages 8-9.

The messages have been sent out to the required stakeholders as required using paradigm in 2013-2014. Paradigm searches for duplicates to allow for only one piece of mail to go out to the stakeholder and prevents sending of multiples to a stakeholder that may be receiving the information for more than one stakeholder group.

1.06 Written Evaluation Plan

Does the operator's program include a written evaluation process that specifies how the operator will periodically evaluate program implementation and effectiveness? If not, did the operator provide justification in its program or procedural manual?

- Verify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate self-assessments (annual audits) and effectiveness evaluations.
- Verify the operator's evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart).
- Identify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences surveys and feedback.

CODE REFERENCE: § 192.616 (c),(i); § 195.440 (c),(i)

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

The written evaluation process is defined in G of Section 10 on pages 9-11. Staff reviewed the annual reviews (1 year) and effectiveness evaluation (4 years) performed in 2013-2014. Due to a lack of adequate responses by Public Officials in 2014, USDI enlisted Paradigm to conduct phone surveys to the Public Officials and have not yet received the results.

In the Effectiveness Measurement Statistics and Reporting Paradigm utilizes the standard method for statistical purposes. Margin of error is calculated via American Research Group calculator. This is located on page 4 of the Paradigm Material for Prairieland in 2014.

2. Program Implementation

2.01 English and other Languages

Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

- Determine if the operator delivers material in languages other than English and if so, what languages.
- Identify the process the operator used to determine the need for additional languages for each stakeholder audience.
- Identify the source of information the operator used to determine the need for additional languages and the date the information was collected.

CODE REFERENCE: § 192.616 (g); § 195.440 (g), API RP 1162 Section 2.3.1

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

Prairieland delivers their materials in English and Spanish. The process utilized to determine when a second or more language is required is defined in D of Section 10 on pages 6-7. USDI utilizes the statistics from the US Census Bureau every 5 years to determine when another language may be required when 10% of the area population speaks another language.

2.02 Message Type and Content

Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:

- ☒ Use of a one-call notification system prior to excavation and other damage prevention activities;
 - ☒ Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;
 - ☒ Physical indications of a possible release;
 - ☒ Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and
 - ☒ Procedures to report such an event (to the operator)?
-
- ☒ Verify all required information was delivered to each of the primary stakeholder audiences.
 - ☒ Verify the phone number listed on message content is functional and clearly identifies the operator to the caller.

☐ Affected public

☐ Emergency officials

☐ Public officials

☐ Excavators

CODE REFERENCE: § 192.616 (d), (f); § 195.440 (d), (f)

- ☒ S - Satisfactory (explain)
 - ☐ U - Unsatisfactory (explain)
 - ☐ N/A - Not applicable (explain)
 - ☐ N/C - Not Checked (explain)

COMMENTS:

Staffs review of the flyer sent to the Stakeholder included the use of a one-call program prior to excavation, possible hazards associated with gas a release, physical indications of a possible release, steps to be taken for public safety in the event of a release and procedures to report such an event.

Staff reviewed the mailing list for stakeholders established and utilized by Paradigm for the PA mailings.

The phone numbers listed in the information provided are current numbers for both the Operator contact and the consultant who performs the system operations, maintenance and emergency response.

2.03 Messages on Pipeline Facility Locations

Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?

- ☒ Verify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations.

CODE REFERENCE: § 192.616 (e)(f); § 195.440 (e)(f)

- ☒ S - Satisfactory (explain)
 - ☐ U - Unsatisfactory (explain)
 - ☐ N/A - Not applicable (explain)
 - ☐ N/C - Not Checked (explain)

COMMENTS:

Review of the mailing lists indicate the stakeholders were provided the required messages.

2.04 Baseline Message Delivery Frequency

Did the operator's delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?

- Identify message delivery (using the operator's last five years of records) for the following stakeholder audiences:

- ☐ Affected public
☐ Emergency officials
☐ Public officials
☐ Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c)

- ☒ S - Satisfactory (explain)
☐ U - Unsatisfactory (explain)
☐ N/A - Not applicable (explain)
☐ N/C - Not Checked (explain)

COMMENTS:

In the 4 year effectiveness evaluation, the baseline of 2.40% for responses from public officials was not met with 2.33% being received. Due to this USDI contracted Paradigm to perform a phone survey of public officials. As of the date of this audit USDI has not received the results of the survey. Paradigm was contacted by USDI during the audit and were informed Paradigm was in the process of finalizing the report.

2.05 Considerations for Supplemental Program Enhancements

Did the operator consider, along all of its pipeline systems, relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience?

- ☐ Affected public
☐ Emergency officials
☐ Public officials
☐ Excavators

Determine if the operator has considered and/or included other relevant factors for supplemental enhancements.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 6.2

- ☒ S - Satisfactory (explain)
☐ U - Unsatisfactory (explain)
☐ N/A - Not applicable (explain)
☐ N/C - Not Checked (explain)

COMMENTS:

No supplemental enhancements other than not meeting the baselines were implemented by Prairieland due to, no incidents or damages, encroachments or close calls occurring on the Prairieland Pipeline.

2.06 Maintaining Liaison with Emergency Response Officials

Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator's ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

- ☒ Examine the documentation to determine how the operator maintains a relationship with appropriate emergency officials.
- ☒ Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.
- ☒ Identify the operator's expectations for emergency responders and identify whether the expectations are the same for all locations or does it vary depending on locations.
- ☒ Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.
- ☒ Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 4.4

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

Staff reviewed 2011-2014 liaison records indicated that Prairieland / USDI has maintained liaison with the local emergency responders in Crawford County. Liaison was established by initial mailings, phone contact and supplying them with the emergency plan and a map of the Prairieland system via email.

Prairieland / USDI established and confirmed the role emergency responders are to take in a pipeline emergency on the Prairieland system during the liaison meetings that have been completed. That role is securing the area and preventing anyone from entering other than authorized personnel.

USDI has maintained liaison with emergency responders using phone contact and email to send files for review.

3. Program Evaluation & Continuous Improvement (Annual Implementation Audits)

3.01 Measuring Program Implementation

Has the operator performed an audit or review of its program implementation annually since it was developed? If not, did the operator provide justification in its program or procedural manual?

- ☒ Verify the operator performed an annual audit or review of the PAP for each implementation year.

CODE REFERENCE: § 192.616 (c), (i); § 195.440 (c), (i), API RP 1162 Section 8.3

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

Prairieland / USDI has conducted annual audits of the PA plan as required. These are documented on the annual review Sheet 1001 which were reviewed as part of this inspection.

3.02 Acceptable Methods for Program Implementation Audits

Did the operator use one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) to complete the annual audit or review of its program implementation? If not, did the operator provide valid justification for not using one of these methods?

- Determine how the operator conducts annual audits/reviews of its PAP.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

PrairieLand / USDI utilized internal and regulatory audits to complete the annual audits of the program implementation. Internal audits utilize a checklist established by USDI that evaluates Program Development and Documentation, Program Implementation, Program Responses and Damage Prevention.

3.03 Program Changes and Improvements

Did the operator make changes to improve the program and/or the implementation process based on the results and findings of the annual audit? If not, did the operator provide justification in its program or procedural manual?

- Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result.
- If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

PrairieLand / USDI did make changes to the plan based on the results of the annual audits. They implemented utilizing Paradigm to make phone surveys due to not meeting the baseline percentages.

4. Program Evaluation & Continuous Improvement (Effectiveness Evaluations)

4.01 Evaluating Program Effectiveness

Did the operator perform an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation) to assess its program effectiveness in all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Verify the operator conducted an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation).
- Document when the effectiveness evaluation was completed.
- Determine what method was used to perform the effectiveness evaluation (in-house, by 3rd party contractor, participation in and use the results of an industry group or trade association).
- Identify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP1162 Section 8.4

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

Program effectiveness reviews were performed as required in 2010 and 2014. USDI conducted the effectiveness survey in-house using their Effectiveness Review Checklist #1002.

4.02 Measure Program Outreach

In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Examine the process the operator used to track the number of individuals or entities reached within each intended stakeholder audience group.
- Determine the outreach method the operator used to perform the effectiveness evaluation (e.g., questionnaires, telephone surveys, etc).
- Determine how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.

[] Affected public

[] Emergency officials

[] Public officials

[] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

Using the responses received on completed Business Reply Cards ("BRC") or online submissions the operator determines the amount of the public that responded. This is what is used to determine if the baselines have been met.

4.03 Measure Percentage Stakeholders Reached

Did the operator determine the percentage of the individual or entities actually reached within the target audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- ☒ Document how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.
- ☒ Document how the operator estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group.

- ☐ Affected public
- ☐ Emergency officials
- ☐ Public officials
- ☐ Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

The margin of error was calculated using the standard method for statistical purposes. Margin of error is calculated via American Research Group Inc.

Prairieland utilized Business Reply Cards (BRC") to evaluate the responses received for the questions asked of the stakeholder.

4.04 Measure Understandability of Message Content

In evaluating effectiveness, did the operator assess the percentage of the intended stakeholder audiences that understood and retained the key information in the messages received, within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2)

- ☒ Examine the operator's evaluation results and data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message.
- ☒ Verify the operator assessed the percentage of the intended stakeholder audience that (1) understood and (2) retained the key information in each PAP message.
- ☒ Determine if the operator pre-tests materials.

- ☐ Affected public
- ☐ Emergency officials
- ☐ Public officials
- ☐ Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

After establishing the messages to be utilized, Paradigm utilizes focus groups to establish the understandability of the messages to be delivered to the Stakeholders.

Paradigm submits a report of the number of correct and wrong answers and tabulates this to determine the number of responses received and then calculates for percentages of individuals reached.

4.05 Measure Desired Stakeholder Behavior

In evaluating its public awareness program effectiveness, did the operator attempt to determine whether appropriate preventive behaviors have been understood and are taking place when needed, and whether appropriate response and mitigative behaviors would occur and/or have occurred? If not, did the operator provide justification in its program or procedural manual?

- ☒ Examine the operator's evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.
- ☒ Verify the operator determined whether appropriate prevention behaviors have been understood by the stakeholder audiences and if those behaviors are taking place or will take place when needed.

☐ Affected public

☐ Emergency officials

☐ Public officials

☐ Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.3

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

Prairieland utilized the results of the response card feedback provided by Paradigm. This indicates if the stakeholders are understanding and retained the messages. Prairieland then reviews damages, incidents and behaviors of the stakeholders to determine if the plan is working. There have been no damages or incidents and with the exception of the responses received from the Public Officials, the remainder of the stakeholders appeared to understand and follow the intended behaviors.

4.06 Measure Bottom-Line Results

In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?

- ☒ Examine the operator's process for measuring bottom-line results of its program.
- ☒ Verify the operator measured bottom-line results by tracking third-party incidents and consequences.
- ☒ Determine if the operator considered and attempted to measure other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines. If not, determine if the operator has provided justification in its program or procedural manual for not doing so.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.4

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

In determining bottom-line results, Prairieland tracks third party damages, consequences and near misses. There have been no damages or indications of near misses due to third party excavation.

Prairieland also determines the perception of the safe operation of the system through the results of the survey card responses provided by the stakeholders through the Paradigm surveys.

4.07 Program Changes

Did the operator identify and document needed changes and/or modifications to its public awareness program(s) based on the results and findings of its program effectiveness evaluation? If not, did the operator provide justification in its program or procedural manual?

- Examine the operator's program effectiveness evaluation findings.
- Identify if the operator has a plan or procedure that outlines what changes were made.
- Verify the operator identified and/or implemented improvements based on assessments and findings.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 2.7 Step 12 and 8.5

- ☒ S - Satisfactory (explain)
- ☐ U - Unsatisfactory (explain)
- ☐ N/A - Not Applicable (explain)
- ☐ N/C - Not Checked (explain)

COMMENTS:

Prairieland initiated a follow up phone survey to attempt to reach Public Officials due to failing to meet the established baseline. The plan also has a documentation process to record plan revisions and have been recorded in the Change Log located in the PA plan

5. Inspection

SUMMARY:

Staff's review of the Prairieland Pipeline PA plan established the plan was implemented as required. The effectiveness evaluation was conducted in 2014 as required and determined that the Public Officials responses were not meeting the established baseline. Due to this, Prairieland initiated a phone survey to attempt to achieve responses from this stakeholder and meet or exceed the baseline for responses. Staff observed the annual reviews were also conducted as required by the plan.

FINDINGS: